

NICHOLAS A. TRUTANICH, NSBN 13644  
United States Attorney  
District of Nevada  
TINA NAICKER, CSBN 252766  
Special Assistant United States Attorney  
160 Spear Street, Suite 800  
San Francisco, California 94105  
Telephone: (415) 268-5611  
Facsimile: (415) 744-0134  
E-Mail: Tina.Naicker@SSA.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT**

## DISTRICT OF NEVADA

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Reversal/Remand be extended from October 10, 2019 to November 14, 2019.<sup>1</sup> This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant (Counsel) was out on family leave in late June and early July to take care of her elderly mother, who had two surgeries, and another major surgery in September 2019. In addition, Counsel also has over

<sup>1</sup> Counsel apologizes for the belated request but was out on sick leave on the date of the current filing deadline and filed her request as soon as reasonably practicable.

1 100+ active social security matters, which require two more dispositive motions until mid-November,  
2 and three pending Ninth Circuit matters which require multiple levels of review. Due to unanticipated  
3 leave and heavy caseload, Counsel needs additional time to adequately review the transcript and  
4 properly respond to Plaintiff's Motion for Summary Judgment. The parties further stipulate that the  
5 Court's Scheduling Order shall be modified accordingly. Defendant makes this request in good faith  
6 with no intention to unduly delay the proceedings. Counsel apologizes for the belated request, but  
7 made her request as soon as reasonably practicable following her leave.

8  
9 Respectfully submitted,

10  
11 Dated: October 11, 2019

12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  

---

*/s/ David Chermol*  
(\*as authorized by email on October 11, 2019)  
DAVID CHERMOL  
Attorney for Plaintiff

Dated: October 11, 2019

NICHOLAS A. TRUTANICH  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

By */s/ Tina L. Naicker*  
TINA L. NAICKER  
Special Assistant U.S. Attorney  
Attorneys for Defendant

**[PROPOSED] ORDER**

**APPROVED AND SO ORDERED:**

10-23-2019

DATED: \_\_\_\_\_

  
\_\_\_\_\_  
THE HONORABLE CAM FERENBACH  
UNITED STATES MAGISTRATE JUDGE

## **CERTIFICATE OF SERVICE**

I, TINA L. NAICKER, certify that the following individual was served with a copy of the  
**JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO  
RESPOND TO PLAINTIFF'S MOTION FOR REVERSAL/REMAND.**

on the date and via the method of service identified below:

**ECF Notice:**

David F. Chermol  
Chermol & Fishman, LLC  
11450 Bustelton Ave  
Philadelphia, PA 19116  
215-464-7200  
Fax: 215-464-7224  
Email: dave@ssihelp.us

Hal Taylor  
223 Marsh Avenue  
Reno, NV 89509  
775-825-2223  
Fax: 775-329-1113  
Email: [haltaylorlawyer@gbis.com](mailto:haltaylorlawyer@gbis.com)

Attorneys for Plaintiff

Respectfully submitted this 11th day of October 2019,

/s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant United States Attorney